# Exhibit 6
# Illinois

# Exhibit 6A

# Meta's Proposal[s]

**MDL 3047 – 2024-12-20 Agency Discovery JLB**
**Illinois – Meta Proposal**

**Search Terms:**  Meta has search term disputes with the following Illinois agencies: (i) Board of Education (ii) Department for Children and Family Services, (iii) Department of Human Services, (iv) Department of Public Health, and (v) Office of the Governor. At a high level, Meta's proposal includes some standalone search terms proposed by Illinois with some additional search strings proposed by Meta. Meta's proposal also includes additional search string combinations consisting of the "Additional Terms" proposed by Meta that occur "within 50" of one of the following "Youth Terms":

> ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*"
> OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR "under-age" OR
> juvenile* OR U18 OR "under 18" OR U13 OR "under 13" OR (gen* w/5 z)
> OR "gen* z" OR "gen-z*" OR "gen z" OR (gen* w/5 alpha) OR "gen-a*" OR
> "gen* alpha" OR scholar* OR school* OR student* OR pupil*)

| # | Standalone Search Terms |
|---|---|
| 1. | Any emails to/from/cc/bcc: any recipient with domain @meta.com, or @facebook.com, or @fb.com |
| 2. | "children's mental health" **AND** "social media" |
| 3. | "youth mental health" **AND** "social media" |
| 4. | "children's behavioral health transformation initiative" |
| 5. | "Illinois Children's Mental Health Partnership" |
| 6. | "ICAC" |
| 7. | "COPPA" |
| 8. | "social dilemma" |
| 9. | Cyberbull* **AND** ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR "under-age" OR juvenile OR U18 OR "under 18" OR U13 OR "under 13" OR (gen* w/5 z) OR "gen* z" OR "gen-z*" OR "gen z" OR (gen* w/5 alpha) OR "gen-a*" OR "gen* alpha" OR scholar* OR school* OR student* OR pupil*) |
| 10. | Screentime |
| 11. | "screen time" |

| | |
|---|---|
| 12. | ((“social media” OR Facebook OR Instagram OR “META” OR tiktok OR Snapchat OR Bytedance OR twitter) **w/15** (complain* OR investigat*)) |
| 13. | “surgeon general” **w/50** “social media” |
| 14. | ((“social media” OR Facebook OR Instagram OR “META” OR tiktok OR Snapchat OR Bytedance OR twitter) **w/50** (policy OR policies  OR procedure* OR guideline*)) |
| 15. | ("social media" OR “social network” OR  OR Insta OR "meta" OR Snapchat OR Bytedance OR TikTok OR OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR “screen time” OR screentime OR “direct message” OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta) **AND** ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR “under-age” OR juvenile  OR U18 OR “under 18” OR U13 OR “under 13” OR  (gen* w/5 z) OR “gen* z” OR “gen-z*” OR “gen z” OR (gen* w/5 alpha) OR “gen-a*” OR “gen* alpha” OR scholar* OR school* OR student* OR pupil* ) |
| 16. | (Facebook OR Instagram OR Twitter OR DM) **w/ 15** ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR “under-age” OR juvenile* OR U18 OR “under 18” OR U13 OR “under 13” OR (gen* w/5 z) OR “gen* z” OR “gen-z*” OR “gen z” OR (gen* w/5 alpha) OR “gen-a*” OR “gen* alpha” OR scholar* OR school* OR student* OR pupil*) |
| 17. | “Social media” **AND** “copyright” **AND** “mental health” |
| 18. | “Social media” **AND** “abstract” **AND** “mental health” |
| 19. | “Social media” **AND** “abstract” **AND** “wellbeing” |
| 20. | “negativ*” **w/25** “compar*” |
| 21. | “consumer protection” **AND** ("minor*" OR "youth*" OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR U18 OR “under 18” OR U13 OR “under 13” OR “gen* z” OR “gen-z*” OR “gen z” OR “gen-a*” OR “gen* alpha” OR scholar* OR school* OR student* OR pupil*) |
| 22. | "adverse childhood experience*" **OR** ACE* |
| 23. | (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)) **w/ 50** ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR “under-age” OR juvenile* OR U18 OR “under 18” OR U13 OR “under 13” OR (gen* w/5 z) OR “gen* z” OR “gen-z*” OR “gen z” OR (gen* w/5 alpha) OR “gen-a*” OR “gen* alpha” OR scholar* OR school* OR student* OR pupil*) |
| 24. | (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) |

| | **Additional Terms** |
|---|---|
| 26. | Youth Terms **w/50** (wellbeing OR well-being OR self-confidence OR "self confidence" OR "mental health" OR "TMH" OR "anxi*" OR "anti-anxie*" or "DEPRESS*" OR antidepress*" OR reclus* OR stress OR "attention defecit" OR "ADHD" OR postraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR lonel*) |
| 27. | Youth Terms **w/50** ("pro-ana" OR "BMI" OR "overweight" OR fat OR obes* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive) |
| 28. | Youth Terms **w/50** (bully* OR bullie* OR cyberbull* OR harass* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR solicit* OR pedophil* OR predator* OR sextort OR exploit* OR violen* OR abus* OR assault* OR misbehav* OR rape) |
| 29. | Youth Terms **w/50** (addic* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime timespent OR "time spent"OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control") |
| 30. | Youth Terms **w/50** (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) |
| 31. | Youth Terms **w/50** (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) |
| 32. | Youth Terms **w/50** (negative w/3 ("appearance comparison" OR experience OR affect* OR effect*) |
| 33. | Youth Terms **w/50** (compar w/5 (appearance OR social OR other* OR negative)) |
| 34. | Youth Terms **w/50** (svap* OR "ecig" OR "e-cig" OR cig* OR drug* OR alcohol* OR Juul) |

**Custodians:** Meta proposes that the above search terms be run on each agency's custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the "Relevant Time[]" in Plaintiffs' Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a "Relevant Time[]" that starts "no later than 2012").

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (*) have been affirmatively proposed and agreed to by the Illinois AG's office during the course of the Parties' negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each

agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

| Agency | Custodian | Title |
|---|---|---|
| Board of Education | Kristin Kennedy* (Illinois agreed that it would propose a replacement) | Chief Legal Officer |
| Board of Education | Jennifer Saba* | Chief Education Officer of Operations |
| Board of Education | Melissa Oller* | Chief Operating Officer |
| Board of Education | Rae Clementz* | Executive Director, Data Accountability and Assessment |
| Department of Children and Family Services | Jassen Strokosch* | Former Chief of Staff |
| Department of Children and Family Services | Heather Tarczan* | Deputy Director of Communications |
| Department of Children and Family Services | Julie Barbosa* | Chief Deputy Director, Strategy and Performance Execution |
| Department of Children and Family Services | Mary Nam* | Former Associate Director, Strategy and Performance Execution |
| Department of Children and Family Services | Bill McCaffrey* | Former Director of Communications |
| Department of Human Services | Dulce Quintero* | Secretary of Human Services; Former Assistant Secretary of Operations |
| Department of Human Services | Grace Hou* | Secretary of Human Services |
| Department of Human Services | James Dimas* | Secretary of Human Services |
| Department of Human Services | Kia Coleman* | Assistant Secretary |

| Department of Human Services | Priya Khatkhate* | System transformation Administrator; Former Senior Policy Advisor |
|---|---|---|
| Department of Human Services | David Albert* | Director, Division of Mental Health; Former Deputy Director of Clinical Operations |
| Department of Human Services | Diane Knaebe* | Director, Division of Mental Health |
| Department of Human Services | Lisa Betz* | Deputy Director, Child and Adolescent Services |
| Department of Human Services | Ryan Rollinson | Chief of Staff |
| Department of Public Health | Dana Weiner | Chief Officer |
| Department of Public Health | Sameer Vohra* | Director of the Department |
| Department of Public Health | Shannon Lightner* | COO; Former Deputy Director of the Office of Women's and Family Services |
| Department of Public Health | Lisa Masinter* | Deputy Director of the Office of Women's and Family Services |
| Department of Public Health | Julie Davis* | N/A |
| Department of Public Health | Melissa Stalets* | Deputy Director of the Office of Health Promotion |
| Department of Public Health | Sarah Patrick, M.D. * | Epidemiologist, Office of Health Promotion |
| Office of the Governor | Andy Manar* | Deputy Governor, Budget and Economy |
| Office of the Governor | Dan Hynes* | Deputy Governor, Budget and Economy |
| Office of the Governor | Claire Lindberg* | 1st Assistant Deputy Governor, Budget and Economy |

| Office of the Governor | Lisa Duarte* | 1st Assistant Deputy Governor, Budget and Economy |
|---|---|---|
| Office of the Governor | Christy George* | 1st Assistant Deputy Governor, Budget and Economy |
| Office of the Governor | Grace Hou* | Deputy Governor, Human Services |
| Office of the Governor | Sol Flores* | Deputy Governor, Human Services |
| Office of the Governor | Lizzy Whitehorn* | 1st Assistant Deputy Governor, Human Services |
| Office of the Governor | Ryan Croke* | 1st Assistant Deputy Governor, Human Services |
| Office of the Governor | Martin Torres* | Deputy Governor, Education |
| Office of the Governor | Jesse Ruiz* | Deputy Governor, Education |
| Office of the Governor | Teresa Ramos* | 1st Assistant Deputy Governor, Education |
| Office of the Governor | Christian Mitchell* | Deputy Governor, Public Safety and Infrastructure |
| Office of the Governor | Bria Scudder* | Deputy Governor, Public Safety and Infrastructure |
| Office of the Governor | Camile Lindsay* | 1st Assistant Deputy Governor, Public Safety and Infrastructure |
| Office of the Governor | Shareese Pryor* | 1st Assistant Deputy Governor, Public Safety and Infrastructure |
| Office of the Governor | Emily Miller* | Legislative and Policy |
| Office of the Governor | Chris Shallow* | Legislative and Policy |
| Office of the Governor | Lee LoBue* | Legislative and Policy |

| Office of the Governor | Leslie Munger* | Former Deputy Governor |
|---|---|---|
| Office of the Governor | Richard Goldberg* | Former Deputy Chief of Staff |
| Office of the Governor | Rodger Heaton* | Former Deputy Chief of Staff |
| Office of the Governor | Michael Lucci* | Former Deputy Chief of Staff |
| Office of the Governor | Darlene Senger | Former Deputy Chief of Staff |
| Office of the Governor | Jennifer Hammer | Former Special Counsel to the Governor and Policy Adviser for Healthcare and Human Services |

# Exhibit 6B

# Illinois's

# Proposal[s]

**MDL 3047 – Illinois December 13<sup>th</sup> Counterproposal Search Terms**

**Illinois provided the below counterproposal to Meta on December 13<sup>th</sup>. Illinois agreed to expand the use of search terms to cover the previously disputed Illinois Department of Public Health ("IDPH"). Illinois also agreed to run the full list of terms, as opposed to a subset, over two additional agencies DHS and ISBE. Illinois will also run the full terms over the Governor's Office. Illinois continues to believe that search terms are not warranted or appropriate for the Illinois Department of Children and Family Services ("DCFS").**

**Search terms may require further limitation once data exports are complete and more fulsome hit reports can be generated.**

**Search Terms:**

("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR "under-age" OR juvenile* OR U18 OR "under 18" OR U13 OR "under 13" OR "gen* z" OR "gen-z*" OR "gen z" OR "gen-a*" OR "gen* alpha" OR scholar* OR school* OR student* OR pupil*)

| # | Standalone Search Terms |
|---|---|
| 1. | "children's behavioral health transformation initiative" |
| 2. | "Illinois Children's Mental Health Partnership" |
| 3. | "ICAC" |
| 4. | "COPPA" |
| 5. | "social dilemma" |
| 6. | ((("social media" OR Facebook OR Instagram OR "META" OR tiktok OR Snapchat OR Bytedance OR twitter) **w/15** (complain* OR investigat*)) |
| 7. | "surgeon general" **w/50** "social media" |
| 8. | ((("social media" OR Facebook OR Instagram OR "META" OR tiktok OR Snapchat OR Bytedance OR twitter) **w/15** (policy OR policies OR procedure* OR guideline*)) |
| 9. | ("social media" OR "social network" OR  OR Insta OR "meta" OR Snapchat OR Bytedance OR TikTok OR OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR "screen time" OR screentime OR "direct message" OR Tumblr OR telegram OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR "Yik Yak" OR finsta) **AND** ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR "under-age" OR juvenile OR U18 OR "under 18" OR U13 OR "under 13" OR "gen* z" OR "gen-z*" OR "gen z" OR "gen- a*" OR "gen* alpha" OR scholar* OR school* OR student* OR pupil* ) |

| | |
|---|---|
| 10. | (Facebook OR Instagram OR Twitter OR DM) **w/ 15** ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR "under-age" OR juvenile* OR U18 OR "under 18" OR U13 OR "under 13" OR "gen* z" OR "gen-z*" OR "gen z" OR "gen- a*" OR "gen* alpha" OR scholar* OR school* OR student* OR pupil*) |
| 11. | "Social media" **AND** "copyright" **AND** "mental health" |
| 12. | "Social media" **AND** "abstract" **AND** "mental health" |
| 13. | "Social media" **AND** "abstract" **AND** "wellbeing" |
| 14. | "consumer protection" **AND** ("minor*" OR "youth*" OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR U18 OR "under 18" OR U13 OR "under 13" OR "gen* z" OR "gen-z*" OR "gen z" OR "gen-a*" OR "gen* alpha" OR scholar* OR school* OR student* OR pupil*) |
| 15. | "adverse childhood experience*" |
| 16. | (Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR "social* distanc*")) **w/ 25** ("minor*" OR "youth*" OR young OR "kid*" OR "teen*" OR "adolescent*" OR "preteen*" OR "pre-teen*" OR "tween*" OR underage* OR "under-age" OR juvenile* OR U18 OR "under 18" OR U13 OR "under 13" OR "gen* z" OR "gen-z*" OR "gen z" OR "gen-a*" OR "gen* alpha" OR scholar* OR school* OR student* OR pupil*) |
| 17. | (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) |
| 18. | Youth Terms **w/25** (wellbeing OR well-being OR self-confidence OR "self confidence" OR "mental health" OR "TMH" OR "anxi*" OR "anti-anxie*" or "DEPRESS*" OR antidepress*" OR reclus* OR "attention defecit" OR "ADHD" OR postraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR lonel*) |
| 19. | Youth Terms **w/25** ("pro-ana" OR "BMI" OR "overweight" OR fat OR obes* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive) |
| 20. | Youth Terms **w/50** (bully* OR bullie* OR cyberbull* OR harass* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR solicit* OR pedophil* OR predator* OR sextort OR exploit* OR violen* OR assault* OR misbehav* OR rape) |
| 21. | Youth Terms **w/25** (addic* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime timespent OR "time spent"OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control") |
| 22. | Youth Terms **w/25** (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) |

| 23. | Youth Terms **w/25** (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) |
|---|---|
| 24. | Youth Terms **w/25** (negative w/3 ("appearance comparison" OR experience OR affect* OR effect*) |
| 25. | Youth Terms **w/25** (compar w/5 (appearance OR social OR other* OR negative)) |

### MDL 3047 – Illinois December 13ᵗʰ Counterproposal Custodians

**Custodians:** Meta proposed that the above search terms be run on each agency's custodial documents from January 1, 2012 to April 1, 2024. Illinois's counterproposal is for documents from January 1, 2015 to the filing of the complaint on October 21, 2023. Illinois maintains that search terms are unwarranted for Illinois Department of Children and Family Services.

| Agency | Custodian | Title |
|---|---|---|
| Board of Education | [Replacement TBD] | [Replacement TBD] |
| Board of Education | Jennifer Saba | Chief Education Officer of Operations |
| Board of Education | Melissa Oller | Chief Operating Officer |
| Board of Education | Rae Clementz | Executive Director, Data Accountability and Assessment |
| Department of Human Services | Dulce Quintero | Secretary of Human Services; Former Assistant Secretary of Operations |
| Department of Human Services | Grace Hou | Secretary of Human Services |
| Department of Human Services | James Dimas | Secretary of Human Services |
| Department of Human Services | Kia Coleman | Assistant Secretary |
| Department of Human Services | Priya Khatkhate | System transformation Administrator; Former Senior Policy Advisor |
| Department of Human Services | David Albert | Director, Division of Mental Health; Former Deputy Director of Clinical Operations |
| Department of Human Services | Diane Knaebe | Director, Division of Mental Health |
| Department of Human Services | Lisa Betz | Deputy Director, Child and Adolescent Services |
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| Department of Public Health | Shannon Lightner | COO; Former Deputy Director of the Office of Women's and Family Services |

| | | |
|---|---|---|
| Department of Public Health | Lisa Masinter | Deputy Director of the Office of Women's and Family Services |
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| Department of Public Health | Sarah Patrick, M.D. | Epidemiologist, Office of Health Promotion |
| Office of the Governor | Grace Hou | Deputy Governor, Human Services |
| Office of the Governor | Sol Flores | Deputy Governor, Human Services |
| Office of the Governor | Martin Torres | Deputy Governor, Education |
| Office of the Governor | Jesse Ruiz | Deputy Governor, Education |
| Office of the Governor | Emily Miller | Legislative and Policy |
| Office of the Governor | Chris Shallow | Legislative and Policy |
| Office of the Governor | Lee LoBue | Legislative and Policy |
| Office of the Governor | Leslie Munger | Former Deputy Governor |
| Office of the Governor | Richard Goldberg | Former Deputy Chief of Staff |
| Office of the Governor | Rodger Heaton | Former Deputy Chief of Staff |
| Office of the Governor | Michael Lucci | Former Deputy Chief of Staff |
| Office of the Governor | Darlene Senger | Former Deputy Chief of Staff |
| Office of the Governor | Jennifer Hammer | Former Special Counsel to the Governor and Policy Adviser for Healthcare and Human Services |

## MDL 3047 – Illinois December 13th Counterproposal Targeted Searches

Illinois has continually expressed a willingness to undertake targeted searches pursuant to identified requests for all agencies. Meta has not identified specific types or categories of documents subject to such an effort.